

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES BARRETT,

Defendant.

CASE NO. 1:22-CR-00213-JAM
STIPULATION OF EXPECTED TESTIMONY

The parties hereby agree and stipulate to the expected testimony of two witnesses: Stephanie Forte and Rene Keyzer-Andre.

A. If re-called as a witness, Stephanie Forte would testify:

1. I had a conversation in March 2020 with Rene Keyzer-Andre and Margarita Martinez. They lived in an area of Kentucky to which Charles Barrett had recently moved.
2. I have known Mr. Keyzer-Andre and Ms. Martinez since the 1990s.
3. I called to warn them that local women might begin reporting sexual assault claims against Barrett and should be believed.
4. I told Mr. Keyzer-Andre and Ms. Martinez that Mr. Barrett had sexually assaulted me. I used the term "sexual assault" to describe what Mr. Barrett did. I did not share details of the assault with them.

B. If called as a witness Rene Keyzer-Andre would testify:

1. I and my wife Margarita Martinez had a conversation with Stephanie Forte in March 2020.
2. As the time, my wife and I lived in an area of Kentucky to which Charles Barrett had recently moved.
3. I have known Stephanie Forte since the 1990s.
4. Ms. Forte called us to warn us that Mr. Barrett had sexually assaulted women and that we should pass a warning about Mr. Barrett to local female climbers.

- 1 5. Ms. Forte used terms like “sexual assault” and “assault” during the conversation.
- 2 6. We asked Ms. Forte whether Mr. Barrett had done anything to her. She stated that he had
- 3 not. She stated that Barrett had made a pass and her and she had shut him down.
- 4 7. I and my wife exchanged further messages with Ms. Forte around this time. Ms. Forte stated
- 5 that she was scared of Mr. Barrett.
- 6

7 IT IS SO STIPULATED

8

9 Dated: February 9, 2024

PHILLIP A. TALBERT
United States Attorney

11 By: /s/ ARIN C. HEINZ
12 /s/ MICHAEL G. TIERNEY
13 ARIN C. HEINZ
MICHAEL G. TIERNEY
Assistant United States
Attorneys

15 Dated: February 9, 2024

16 By: /s/ TIMOTHY HENNESSY
17 /s/ DAVID TORRES
TIMOTHY HENNESSY
DAVID TORRES
Counsel for Defendant
Charles Barrett